## HAWKINSON EXHIBIT E

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1
              IN THE UNITED STATES DISTRICT COURT
               FOR THE EASTERN DISTRICT OF TEXAS
 2
                       MARSHALL DIVISION
 3
 4
                                   ) No. 2:20-CV-281-JRG
 5
     KAIFI LLC,
 6
                    Plaintiff,
 7
         v.
     T-MOBILE US, INC. and
 8
 9
     T-MOBILE USA, INC.,
                    Defendants.
10
11
12
                   DEPOSITION OF PETER RYSAVY
13
                         March 31, 2021
14
                           Wednesday
15
                           8:30 A.M.
16
17
               THE VIDEOTAPED DEPOSITION OF PETER RYSAVY
18
     was taken by remote videoconferencing set up by
19
     Schmitt Reporting - Veritext Portland, 400 NW
     Columbia Street, Suite 140, Vancouver, Washington,
20
     before Sara Fahey Wilson, CSR, Certified Shorthand
21
     Reporter in and for the State of Oregon.
22
23
24
25
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1 ADDEAD ANGEG	
1 APPEARANCES	1 THE VIDEOGRAPHER: Good morning. 08:27
2 (All counsel appearing by remote videoconference) 3	2 We're now on the record. Today's date is March 08:27
	3 31st, 2021, and the time is 8:29 a.m. 08:27
4 For the Plaintiff:	4 This is the unit media unit one of 08:27
5 IRELL & MANELLA	5 the video recorded deposition of Peter Rysavy being 08:27
6 1800 Avenue of the Stars, Suite 900	6 taken in the matter of Kaifi LLC versus T-Mobile 08:27
7 Los Angeles, California 90067-4276 8 310-277-1010	7 U.S., Inc. 08:27
8 310-277-1010 9 BY: MR. JASON G. SHEASBY	8 The court reporter is Sara Wilson, who 08:27
10 jsheasby@irell.com	9 will now swear or affirm the witness. 08:28
11 Jsheasoy@hen.com	10 08:28
12 For the Defendants:	11 PETER RYSAVY, 08:26
13 GIBSON DUNN	12 having been first duly sworn to testify the truth, 08:25 13 the whole truth, and nothing but the truth, was 08:23
14 2001 Ross Avenue, Suite 2100	13 the whole truth, and nothing but the truth, was 08:23 14 examined and testified as follows: 08:22
15 Dallas, Texas 75201	14 examined and testified as follows: 08:22
16 214-698-3423	16 EXAMINATION 08:18
17 BY: MR. NATHAN R. CURTIS	17 BY MR. SHEASBY: 08:28
18 ncurtis@gibsondunn.com	18 Q. Good morning, sir. Can you state your 08:28
19	19 name for the record. 08:28
20 Videographed By:	20 A. Peter Rysavy. 08:28
21 MR. TIM GARRETT	21 Q. You've been retained as an expert by 08:28
22	22 T-Mobile. Is that correct? 08:28
23 Zoom Monitor:	23 A. That's correct. 08:28
24 MR. RICARDO YI - VERITEXT	24 Q. You submitted an expert declaration in 08:28
25	25 this case. Is that correct? 08:28
Page 2	Page 4
1 INDEX	1 A. Yes, I did. 08:28
2	2 Q. Did you write the expert declaration 08:28
2 3 WITNESSPAGE	2 Q. Did you write the expert declaration 08:28 3 yourself? 08:28
3 WITNESSPAGE	3 yourself? 08:28
3 WITNESSPAGE 4 PETER RYSAVY	3 yourself? 08:28 4 A. I wrote it in conjunction with the 08:28
3 WITNESSPAGE 4 PETER RYSAVY 5 BY MR. SHEASBY 4	3 yourself? 08:28 4 A. I wrote it in conjunction with the 08:28 5 attorney I worked with at Gibson Dunn. 08:28
3 WITNESSPAGE 4 PETER RYSAVY 5 BY MR. SHEASBY 4	3 yourself? 08:28 4 A. I wrote it in conjunction with the 08:28 5 attorney I worked with at Gibson Dunn. 08:28 6 Q. You collaborated with the attorney at 08:28
3 WITNESSPAGE 4 PETER RYSAVY 5 BY MR. SHEASBY 4 6 7 EXHIBITSPAGE 8 Exhibit 1 Exhibit 1 to the Declaration 12 9 of Peter Rysavy - 728 Patent	3 yourself? 08:28 4 A. I wrote it in conjunction with the 08:28 5 attorney I worked with at Gibson Dunn. 08:28 6 Q. You collaborated with the attorney at 08:28 7 Gibson Dunn? 08:28 8 A. Yes. 08:28 9 Q. Did you have an opportunity to read the 08:28
3 WITNESSPAGE 4 PETER RYSAVY 5 BY MR. SHEASBY 4 6 7 EXHIBITSPAGE 8 Exhibit 1 Exhibit 1 to the Declaration 12 9 of Peter Rysavy - 728 Patent 10 Exhibit 2 Distributed Router 22	3 yourself? 08:28 4 A. I wrote it in conjunction with the 08:28 5 attorney I worked with at Gibson Dunn. 08:28 6 Q. You collaborated with the attorney at 08:28 7 Gibson Dunn? 08:28 8 A. Yes. 08:28 9 Q. Did you have an opportunity to read the 08:28 10 declaration of Mr. Blackburn? 08:28
3 WITNESSPAGE 4 PETER RYSAVY 5 BY MR. SHEASBY 4 6 7 EXHIBITSPAGE 8 Exhibit 1 Exhibit 1 to the Declaration 12 9 of Peter Rysavy - 728 Patent 10 Exhibit 2 Distributed Router 22 11 Architecture for	3 yourself? 08:28 4 A. I wrote it in conjunction with the 08:28 5 attorney I worked with at Gibson Dunn. 08:28 6 Q. You collaborated with the attorney at 08:28 7 Gibson Dunn? 08:28 8 A. Yes. 08:28 9 Q. Did you have an opportunity to read the 08:28 10 declaration of Mr. Blackburn? 08:28 11 A. Yes, I did read Mr. Blackburn's 08:29
3 WITNESS	3 yourself? 08:28 4 A. I wrote it in conjunction with the 08:28 5 attorney I worked with at Gibson Dunn. 08:28 6 Q. You collaborated with the attorney at 08:28 7 Gibson Dunn? 08:28 8 A. Yes. 08:28 9 Q. Did you have an opportunity to read the 08:28 10 declaration of Mr. Blackburn? 08:28 11 A. Yes, I did read Mr. Blackburn's 08:29 12 declaration. 08:29
3 WITNESSPAGE 4 PETER RYSAVY 5 BY MR. SHEASBY 4 6 7 EXHIBITSPAGE 8 Exhibit 1 Exhibit 1 to the Declaration 12 9 of Peter Rysavy - 728 Patent 10 Exhibit 2 Distributed Router 22 11 Architecture for 12 Packet-Routed Optical 13 Networks	3 yourself? 08:28 4 A. I wrote it in conjunction with the 08:28 5 attorney I worked with at Gibson Dunn. 08:28 6 Q. You collaborated with the attorney at 08:28 7 Gibson Dunn? 08:28 8 A. Yes. 08:28 9 Q. Did you have an opportunity to read the 08:28 10 declaration of Mr. Blackburn? 08:28 11 A. Yes, I did read Mr. Blackburn's 08:29 12 declaration. 08:29 13 Q. Are you prepared to talk about it and 08:29
3 WITNESS	3 yourself? 08:28 4 A. I wrote it in conjunction with the 08:28 5 attorney I worked with at Gibson Dunn. 08:28 6 Q. You collaborated with the attorney at 08:28 7 Gibson Dunn? 08:28 8 A. Yes. 08:28 9 Q. Did you have an opportunity to read the 08:28 10 declaration of Mr. Blackburn? 08:28 11 A. Yes, I did read Mr. Blackburn's 08:29 12 declaration. 08:29 13 Q. Are you prepared to talk about it and 08:29 14 discuss with what you agree and disagree with in 08:29
3 WITNESS	3 yourself? 08:28 4 A. I wrote it in conjunction with the 08:28 5 attorney I worked with at Gibson Dunn. 08:28 6 Q. You collaborated with the attorney at 08:28 7 Gibson Dunn? 08:28 8 A. Yes. 08:28 9 Q. Did you have an opportunity to read the 08:28 10 declaration of Mr. Blackburn? 08:28 11 A. Yes, I did read Mr. Blackburn's 08:29 12 declaration. 08:29 13 Q. Are you prepared to talk about it and 08:29 14 discuss with what you agree and disagree with in 08:29 15 Mr. Blackburn's declaration today? 08:29
3 WITNESS	3 yourself? 08:28 4 A. I wrote it in conjunction with the 08:28 5 attorney I worked with at Gibson Dunn. 08:28 6 Q. You collaborated with the attorney at 08:28 7 Gibson Dunn? 08:28 8 A. Yes. 08:28 9 Q. Did you have an opportunity to read the 08:28 10 declaration of Mr. Blackburn? 08:28 11 A. Yes, I did read Mr. Blackburn's 08:29 12 declaration. 08:29 13 Q. Are you prepared to talk about it and 08:29 14 discuss with what you agree and disagree with in 08:29 15 Mr. Blackburn's declaration today? 08:29 16 A. I can comment on some items with respect 08:29
3 WITNESS	3 yourself? 08:28 4 A. I wrote it in conjunction with the 08:28 5 attorney I worked with at Gibson Dunn. 08:28 6 Q. You collaborated with the attorney at 08:28 7 Gibson Dunn? 08:28 8 A. Yes. 08:28 9 Q. Did you have an opportunity to read the 08:28 10 declaration of Mr. Blackburn? 08:28 11 A. Yes, I did read Mr. Blackburn's 08:29 12 declaration. 08:29 13 Q. Are you prepared to talk about it and 08:29 14 discuss with what you agree and disagree with in 08:29 15 Mr. Blackburn's declaration today? 08:29 16 A. I can comment on some items with respect 08:29 17 to his declaration. 08:29
3 WITNESS	3 yourself? 08:28 4 A. I wrote it in conjunction with the 08:28 5 attorney I worked with at Gibson Dunn. 08:28 6 Q. You collaborated with the attorney at 08:28 7 Gibson Dunn? 08:28 8 A. Yes. 08:28 9 Q. Did you have an opportunity to read the 08:28 10 declaration of Mr. Blackburn? 08:28 11 A. Yes, I did read Mr. Blackburn's 08:29 12 declaration. 08:29 13 Q. Are you prepared to talk about it and 08:29 14 discuss with what you agree and disagree with in 08:29 15 Mr. Blackburn's declaration today? 08:29 16 A. I can comment on some items with respect 08:29 17 to his declaration. 08:29 18 Q. Okay. 08:29
3 WITNESS	3 yourself? 08:28 4 A. I wrote it in conjunction with the 08:28 5 attorney I worked with at Gibson Dunn. 08:28 6 Q. You collaborated with the attorney at 08:28 7 Gibson Dunn? 08:28 8 A. Yes. 08:28 9 Q. Did you have an opportunity to read the 08:28 10 declaration of Mr. Blackburn? 08:28 11 A. Yes, I did read Mr. Blackburn's 08:29 12 declaration. 08:29 13 Q. Are you prepared to talk about it and 08:29 14 discuss with what you agree and disagree with in 08:29 15 Mr. Blackburn's declaration today? 08:29 16 A. I can comment on some items with respect 08:29 17 to his declaration. 08:29 18 Q. Okay. 08:29 19 Do you know what a femtocell and a 08:29
3 WITNESS	3 yourself? 08:28 4 A. I wrote it in conjunction with the 08:28 5 attorney I worked with at Gibson Dunn. 08:28 6 Q. You collaborated with the attorney at 08:28 7 Gibson Dunn? 08:28 8 A. Yes. 08:28 9 Q. Did you have an opportunity to read the 08:28 10 declaration of Mr. Blackburn? 08:28 11 A. Yes, I did read Mr. Blackburn's 08:29 12 declaration. 08:29 13 Q. Are you prepared to talk about it and 08:29 14 discuss with what you agree and disagree with in 08:29 15 Mr. Blackburn's declaration today? 08:29 16 A. I can comment on some items with respect 08:29 17 to his declaration. 08:29 18 Q. Okay. 08:29 19 Do you know what a femtocell and a 08:29 20 nanocell are? 08:29
3 WITNESS	3 yourself? 08:28 4 A. I wrote it in conjunction with the 08:28 5 attorney I worked with at Gibson Dunn. 08:28 6 Q. You collaborated with the attorney at 08:28 7 Gibson Dunn? 08:28 8 A. Yes. 08:28 9 Q. Did you have an opportunity to read the 08:28 10 declaration of Mr. Blackburn? 08:28 11 A. Yes, I did read Mr. Blackburn's 08:29 12 declaration. 08:29 13 Q. Are you prepared to talk about it and 08:29 14 discuss with what you agree and disagree with in 08:29 15 Mr. Blackburn's declaration today? 08:29 16 A. I can comment on some items with respect 08:29 17 to his declaration. 08:29 18 Q. Okay. 08:29 19 Do you know what a femtocell and a 08:29 20 nanocell are? 08:29 21 A. I have heard the terms before, but it 08:29
3 WITNESS	3 yourself? 08:28 4 A. I wrote it in conjunction with the 08:28 5 attorney I worked with at Gibson Dunn. 08:28 6 Q. You collaborated with the attorney at 08:28 7 Gibson Dunn? 08:28 8 A. Yes. 08:28 9 Q. Did you have an opportunity to read the 08:28 10 declaration of Mr. Blackburn? 08:28 11 A. Yes, I did read Mr. Blackburn's 08:29 12 declaration. 08:29 13 Q. Are you prepared to talk about it and 08:29 14 discuss with what you agree and disagree with in 08:29 15 Mr. Blackburn's declaration today? 08:29 16 A. I can comment on some items with respect 08:29 17 to his declaration. 08:29 18 Q. Okay. 08:29 19 Do you know what a femtocell and a 08:29 20 nanocell are? 08:29 21 A. I have heard the terms before, but it 08:29 22 depends on the context. 08:29
3 WITNESS	3 yourself? 08:28 4 A. I wrote it in conjunction with the 08:28 5 attorney I worked with at Gibson Dunn. 08:28 6 Q. You collaborated with the attorney at 08:28 7 Gibson Dunn? 08:28 8 A. Yes. 08:28 9 Q. Did you have an opportunity to read the 08:28 10 declaration of Mr. Blackburn? 08:28 11 A. Yes, I did read Mr. Blackburn's 08:29 12 declaration. 08:29 13 Q. Are you prepared to talk about it and 08:29 14 discuss with what you agree and disagree with in 08:29 15 Mr. Blackburn's declaration today? 08:29 16 A. I can comment on some items with respect 08:29 17 to his declaration. 08:29 18 Q. Okay. 08:29 19 Do you know what a femtocell and a 08:29 20 nanocell are? 08:29 21 A. I have heard the terms before, but it 08:29 22 depends on the context. 08:29 23 Q. In the context of cellular networks, have 08:29
3 WITNESS	3 yourself? 08:28 4 A. I wrote it in conjunction with the 08:28 5 attorney I worked with at Gibson Dunn. 08:28 6 Q. You collaborated with the attorney at 08:28 7 Gibson Dunn? 08:28 8 A. Yes. 08:28 9 Q. Did you have an opportunity to read the 08:28 10 declaration of Mr. Blackburn? 08:28 11 A. Yes, I did read Mr. Blackburn's 08:29 12 declaration. 08:29 13 Q. Are you prepared to talk about it and 08:29 14 discuss with what you agree and disagree with in 08:29 15 Mr. Blackburn's declaration today? 08:29 16 A. I can comment on some items with respect 08:29 17 to his declaration. 08:29 18 Q. Okay. 08:29 19 Do you know what a femtocell and a 08:29 20 nanocell are? 08:29 21 A. I have heard the terms before, but it 08:29 22 depends on the context. 08:29 23 Q. In the context of cellular networks, have 08:29 24 you heard of femtocells? 08:29
3 WITNESS	3 yourself? 08:28 4 A. I wrote it in conjunction with the 08:28 5 attorney I worked with at Gibson Dunn. 08:28 6 Q. You collaborated with the attorney at 08:28 7 Gibson Dunn? 08:28 8 A. Yes. 08:28 9 Q. Did you have an opportunity to read the 08:28 10 declaration of Mr. Blackburn? 08:28 11 A. Yes, I did read Mr. Blackburn's 08:29 12 declaration. 08:29 13 Q. Are you prepared to talk about it and 08:29 14 discuss with what you agree and disagree with in 08:29 15 Mr. Blackburn's declaration today? 08:29 16 A. I can comment on some items with respect 08:29 17 to his declaration. 08:29 18 Q. Okay. 08:29 19 Do you know what a femtocell and a 08:29 20 nanocell are? 08:29 21 A. I have heard the terms before, but it 08:29 22 depends on the context. 08:29 23 Q. In the context of cellular networks, have 08:29

1 Q. So the patent excludes multiple physical 08:57	1 routing function. Correct? 09:02
2 devices performing routing functions. Correct? 08:57	2 A. I haven't considered that question so I 09:02
3 A. As I said, I would need to read the entire 08:57	3 would need to study the specification 09:02
4 patent with that question in mind to answer that 08:57	4 Q. Sir 09:02
5 question. 08:57	5 A to answer that. 09:02
6 Q. Sir, you opined that the patent excludes 08:57	6 Q. It's your opinion that that limitation 09:02
7 multiple physical devices performing the routing 08:57	7 precludes the use of the mobile device from being 09:02
8 function? 08:57	8 involved in the routing function. Correct? 09:02
9 A. I don't recall saying that I gave that 08:57	9 MR. CURTIS: Objection. Form. 09:02
10 opinion. 08:57	10 Misstates testimony. 09:02
11 Q. Okay. 08:57	11 A. I don't have an opinion on how the routing 09:02
Let's go to Exhibit 2, which I marked. 08:58	12 function is done. That's not something that was in 09:03
13 (Deposition Exhibit Number 2 08:58	13 my declaration, and it's not something that I 09:03
marked for identification.) 08:58	14 considered. 09:03
15 A. The only okay. 08:58	15 BY MR. SHEASBY: 09:03
16 BY MR. SHEASBY: 08:58	16 Q. Sir, based on your reading of the patent 09:03
17 Q. Hit refresh. 08:58	17 and you've read the patent multiple times. 09:03
18 A. Okay, I just hit the "refresh." 08:58	18 Correct? 09:03
19 (Pause.) 08:56	19 A. Yes. 09:03
20 Okay. I see a document titled Distributed 08:58	20 Q. Sir, the mobile device cannot be involved 09:03
21 Router Architecture. 08:59	21 in the routing function in this patent. Correct? 09:03
22 Q. Go ahead and review the abstract. 08:59	22 A. Again, I would have to reread the patent 09:03
23 (Pause.) 08:59	23 to answer that question. 09:03
24 A. Okay. I read the abstract. 08:59	24 Q. Based on the reading that you've done to 09:03
25 Q. Does this refresh your recollection that 09:00	25 date. 09:03
Page 22	Page 24
1 it's possible for routing functions to be 09:00	1 A. I'm not prepared to offer an opinion on 09:03
2 distributed across a network? 09:00	2 that without rereading the patent. 09:03
	2 that without rereading the patent.
3 A I would have to study the entire document 09:00	
3 A. I would have to study the entire document 09:00	3 (Pause.) 09:04
4 to come to any opinions on that. 09:00	3 (Pause.) 09:04 4 Q. Are there any mobile devices that you're 09:04
4 to come to any opinions on that. 09:00 5 Q. So the name of the document is called 09:00	3 (Pause.) 09:04 4 Q. Are there any mobile devices that you're 09:04 5 aware of that generate their own location 09:04
4 to come to any opinions on that. 09:00 5 Q. So the name of the document is called 09:00 6 Distributed Router Architecture for Packet-Routed 09:00	3 (Pause.) 09:04 4 Q. Are there any mobile devices that you're 09:04 5 aware of that generate their own location 09:04 6 information without the involvement of other agents? 09:04
4 to come to any opinions on that. 09:00 5 Q. So the name of the document is called 09:00 6 Distributed Router Architecture for Packet-Routed 09:00 7 Optical Networks. 09:00	3 (Pause.) 09:04 4 Q. Are there any mobile devices that you're 09:04 5 aware of that generate their own location 09:04 6 information without the involvement of other agents? 09:04 7 MR. CURTIS: Objection, form. 09:04
4 to come to any opinions on that. 09:00  5 Q. So the name of the document is called 09:00  6 Distributed Router Architecture for Packet-Routed 09:00  7 Optical Networks. 09:00  8 Do you see that, sir? 09:00	3 (Pause.) 09:04 4 Q. Are there any mobile devices that you're 09:04 5 aware of that generate their own location 09:04 6 information without the involvement of other agents? 09:04 7 MR. CURTIS: Objection, form. 09:04 8 A. Location can be derived using multiple 09:04
4 to come to any opinions on that. 09:00  5 Q. So the name of the document is called 09:00  6 Distributed Router Architecture for Packet-Routed 09:00  7 Optical Networks. 09:00  8 Do you see that, sir? 09:00  9 A. I do see that title. 09:00	3 (Pause.) 09:04 4 Q. Are there any mobile devices that you're 09:04 5 aware of that generate their own location 09:04 6 information without the involvement of other agents? 09:04 7 MR. CURTIS: Objection, form. 09:04 8 A. Location can be derived using multiple 09:04 9 different methods. So, for instance, if a device 09:05
4 to come to any opinions on that. 09:00  5 Q. So the name of the document is called 09:00  6 Distributed Router Architecture for Packet-Routed 09:00  7 Optical Networks. 09:00  8 Do you see that, sir? 09:00  9 A. I do see that title. 09:00  10 Q. And you don't know whether it's possible 09:00	3 (Pause.) 09:04 4 Q. Are there any mobile devices that you're 09:04 5 aware of that generate their own location 09:04 6 information without the involvement of other agents? 09:04 7 MR. CURTIS: Objection, form. 09:04 8 A. Location can be derived using multiple 09:04 9 different methods. So, for instance, if a device 09:05 10 obtained its location using GPS, then that would be 09:05
4 to come to any opinions on that. 09:00  5 Q. So the name of the document is called 09:00  6 Distributed Router Architecture for Packet-Routed 09:00  7 Optical Networks. 09:00  8 Do you see that, sir? 09:00  9 A. I do see that title. 09:00  10 Q. And you don't know whether it's possible 09:00  11 to use distributed router architecture for 09:00	3 (Pause.) 09:04 4 Q. Are there any mobile devices that you're 09:04 5 aware of that generate their own location 09:04 6 information without the involvement of other agents? 09:04 7 MR. CURTIS: Objection, form. 09:04 8 A. Location can be derived using multiple 09:04 9 different methods. So, for instance, if a device 09:05 10 obtained its location using GPS, then that would be 09:05 11 a form of a device obtaining its own location 09:05
4 to come to any opinions on that. 09:00  5 Q. So the name of the document is called 09:00  6 Distributed Router Architecture for Packet-Routed 09:00  7 Optical Networks. 09:00  8 Do you see that, sir? 09:00  9 A. I do see that title. 09:00  10 Q. And you don't know whether it's possible 09:00  11 to use distributed router architecture for 09:00  12 communications networks? 09:00	3 (Pause.) 09:04 4 Q. Are there any mobile devices that you're 09:04 5 aware of that generate their own location 09:04 6 information without the involvement of other agents? 09:04 7 MR. CURTIS: Objection, form. 09:04 8 A. Location can be derived using multiple 09:04 9 different methods. So, for instance, if a device 09:05 10 obtained its location using GPS, then that would be 09:05 11 a form of a device obtaining its own location 09:05 12 information. 09:05
4 to come to any opinions on that. 09:00  5 Q. So the name of the document is called 09:00  6 Distributed Router Architecture for Packet-Routed 09:00  7 Optical Networks. 09:00  8 Do you see that, sir? 09:00  9 A. I do see that title. 09:00  10 Q. And you don't know whether it's possible 09:00  11 to use distributed router architecture for 09:00  12 communications networks? 09:00  13 A. Well, I see that it says it's a proposal 09:00	3 (Pause.) 09:04 4 Q. Are there any mobile devices that you're 09:04 5 aware of that generate their own location 09:04 6 information without the involvement of other agents? 09:04 7 MR. CURTIS: Objection, form. 09:04 8 A. Location can be derived using multiple 09:04 9 different methods. So, for instance, if a device 09:05 10 obtained its location using GPS, then that would be 09:05 11 a form of a device obtaining its own location 09:05 12 information. 09:05 13 BY MR. SHEASBY: 09:05
4 to come to any opinions on that. 09:00  5 Q. So the name of the document is called 09:00  6 Distributed Router Architecture for Packet-Routed 09:00  7 Optical Networks. 09:00  8 Do you see that, sir? 09:00  9 A. I do see that title. 09:00  10 Q. And you don't know whether it's possible 09:00  11 to use distributed router architecture for 09:00  12 communications networks? 09:00  13 A. Well, I see that it says it's a proposal 09:00  14 in the abstract. That tells me that this is an idea 09:00	3 (Pause.) 09:04 4 Q. Are there any mobile devices that you're 09:04 5 aware of that generate their own location 09:04 6 information without the involvement of other agents? 09:04 7 MR. CURTIS: Objection, form. 09:04 8 A. Location can be derived using multiple 09:04 9 different methods. So, for instance, if a device 09:05 10 obtained its location using GPS, then that would be 09:05 11 a form of a device obtaining its own location 09:05 12 information. 09:05 13 BY MR. SHEASBY: 09:05 14 Q. And GPS is how does the device obtain 09:05
4 to come to any opinions on that. 09:00  5 Q. So the name of the document is called 09:00  6 Distributed Router Architecture for Packet-Routed 09:00  7 Optical Networks. 09:00  8 Do you see that, sir? 09:00  9 A. I do see that title. 09:00  10 Q. And you don't know whether it's possible 09:00  11 to use distributed router architecture for 09:00  12 communications networks? 09:00  13 A. Well, I see that it says it's a proposal 09:00  14 in the abstract. That tells me that this is an idea 09:00  15 being considered. And also the word "distributed" 09:01	3 (Pause.) 09:04 4 Q. Are there any mobile devices that you're 09:04 5 aware of that generate their own location 09:04 6 information without the involvement of other agents? 09:04 7 MR. CURTIS: Objection, form. 09:04 8 A. Location can be derived using multiple 09:04 9 different methods. So, for instance, if a device 09:05 10 obtained its location using GPS, then that would be 09:05 11 a form of a device obtaining its own location 09:05 12 information. 09:05 13 BY MR. SHEASBY: 09:05 14 Q. And GPS is how does the device obtain 09:05 15 its location information via GPS? 09:05
4 to come to any opinions on that. 09:00  5 Q. So the name of the document is called 09:00  6 Distributed Router Architecture for Packet-Routed 09:00  7 Optical Networks. 09:00  8 Do you see that, sir? 09:00  9 A. I do see that title. 09:00  10 Q. And you don't know whether it's possible 09:00  11 to use distributed router architecture for 09:00  12 communications networks? 09:00  13 A. Well, I see that it says it's a proposal 09:00  14 in the abstract. That tells me that this is an idea 09:00  15 being considered. And also the word "distributed" 09:01  16 is vague, so I would need to read the document to 09:01	3 (Pause.) 09:04 4 Q. Are there any mobile devices that you're 09:04 5 aware of that generate their own location 09:04 6 information without the involvement of other agents? 09:04 7 MR. CURTIS: Objection, form. 09:04 8 A. Location can be derived using multiple 09:04 9 different methods. So, for instance, if a device 09:05 10 obtained its location using GPS, then that would be 09:05 11 a form of a device obtaining its own location 09:05 12 information. 09:05 13 BY MR. SHEASBY: 09:05 14 Q. And GPS is how does the device obtain 09:05 15 its location information via GPS? 09:05 16 A. The device in GPS receives signals from 09:05
4 to come to any opinions on that. 09:00  5 Q. So the name of the document is called 09:00  6 Distributed Router Architecture for Packet-Routed 09:00  7 Optical Networks. 09:00  8 Do you see that, sir? 09:00  9 A. I do see that title. 09:00  10 Q. And you don't know whether it's possible 09:00  11 to use distributed router architecture for 09:00  12 communications networks? 09:00  13 A. Well, I see that it says it's a proposal 09:00  14 in the abstract. That tells me that this is an idea 09:00  15 being considered. And also the word "distributed" 09:01  16 is vague, so I would need to read the document to 09:01  17 come to a clearer understanding of what distributed 09:01	3 (Pause.) 09:04 4 Q. Are there any mobile devices that you're 09:04 5 aware of that generate their own location 09:04 6 information without the involvement of other agents? 09:04 7 MR. CURTIS: Objection, form. 09:04 8 A. Location can be derived using multiple 09:04 9 different methods. So, for instance, if a device 09:05 10 obtained its location using GPS, then that would be 09:05 11 a form of a device obtaining its own location 09:05 12 information. 09:05 13 BY MR. SHEASBY: 09:05 14 Q. And GPS is how does the device obtain 09:05 15 its location information via GPS? 09:05 16 A. The device in GPS receives signals from 09:05 17 GPS satellites and then analyzes the signals to 09:05
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1 A. In the secantical described, that cell   09:11   2 A. Unite secantical described, that cell   09:11   3 agreed-upon construction. And referring to, if I   09:07   4 may, the Joint Claim Construction and Pre-Hearing   09:07   4 may, the Joint Claim Construction and Pre-Hearing   09:07   4 may, the Joint Claim Construction and Pre-Hearing   09:07   5 Interment, it is formation on a leastional area, or 09:07   6 indoor system ID information, or both.   09:07   7 Q. In the patient, the location register would 09:07   8 only store indoor location information or outdoor   09:07   9 location information. It won't store both at the   09:07   10 same time. Correct?   09:08   11 A. I don't believe the patient states that   09:08   12 It doesn't = the patient does not preclude storing   09:08   13 both.   09:08   14 Q. Okay.   09:08   15 Let me ask you the next question, which is   09:08   16 that when the - when the indoor gateway - let me   09:09   18 For 802.11 networks that are connected to   09:08   18 For 802.11 networks that are connected to   09:08   19 the intermet, that connected io is going to be   09:08   19 the intermet, that connected to   09:08   10 A. An 802.11 network or Wi-Fi network can be   09:09   22 MR. CURTIS: Objection, form.   09:09   23 A. An 802.11 network or Wi-Fi network can be   09:09   24 connected to the intermet, and there could be a wire   09:09   25 such as a cable - coax cable, for example, veal.   09:09   26 connected to the intermet, is there any instances in   09:09   27 connecting it?   09:09   3 different question. In the situation when the   09:09   27 connecting it?   09:09   3 different question. In the situation when the   09:09   28 kmc. as cable - coax cable, for example, veal.   09:09   29 kmc. connection is not poing to be a wire ultimately   09:09   29 kmc. connected to the intermet, is there any instances in   09:09   29 kmc. connected is in oping to be a wire ultimately   09:09   29 kmc. connected   09:09   29 kmc. connected   09:09   29 kmc. connected   09:09   29	1 Q. What is location information? 09:06	
3 agreed-upon construction. And referring to, if I 09-07 4 may, the Joint Claim Construction and Pre-Hearing 90-07 4 may, the Joint Claim Construction and Pre-Hearing 90-07 5 fatherent, it's information on a locational area, or 09-07 6 indoor system ID information, or both 09-07 7 Q. In the patent, the location register would 09-07 8 only store indoor location information register would 09-07 8 only store indoor location information or outcome 09-08 11 A. I don't believe the patent states that 09-08 12 I network that doesn't ultimately have a physical 09:11 metwork that doesn't ultimately have a physical 09:11 metwork that doesn't ultimately have a physical 09:11 metwork or wise of metwork or wise in the open of wise. I doesn't ultimately have a physical 09:11 metwork that doesn't ultimately have a physical 09:11 wise. Independent on the internet? 09:11 metwork that doesn't ultimately have a physical 09:11 wise. Independent on the internet? 09:11 metwork that doesn't ultimately have a physical 09:11 wise. Independent on the internet? 09:11 on the wise of metwork or wise. Independent on the internet. 09:12 to able some physical 09:11 metwork that doesn't ultimately have a physical 09:11 metwork that doesn't ultimately have a physical 09:11 on the wise of metwork or wise of metwork or wise. Independent on the internet. 09:01 to calculate the metwork or wise of the patent of the open of wise. In the metwork or wise of the patent or open of the patent or open of the patent or open of the patent or		1 A. In the scenario I described, that cell 09:11
a may, the Joint Claim Construction and Pre-Hearing   99.07   5 Statement, it's information on a locational area, or 09.07   6 indoor system ID information, or both.   09.07   7 Q. In the patent, the location register would   09.07   7 Q. In the patent, the location register would   09.07   7 Q. In the patent, the location register would   09.07   7 Q. In the patent, the location register would   09.07   9 location information. It won't store both at the   09.07   10 same time.   Correct?   09.08   11   10 same time.   Correct?   09.08   12   12   toosan't—the patent states that   09.08   13 both.   09.08   14   Q. Okay.   09.08   13 both.   09.08   14   Q. Okay.   09.08   15   Let me ask you the next question, which is   09.08   17 ask it this way.   09.08   18   For 802.11 networks that are connected to   09.08   19 the internet, that connection is going to be   09.08   19 the internet, though a wire, correct, at some point? 09.09   22   MR. CURTIS: Objection, form.   09.09   23   A. An 802.11 network or Wi-Fi network can be   09.09   24 connected to the internet, and there could be a wire   09.09   25 such as a cable—coax cable, for example, yeah.   09.09   26 connected to the internet, and there could be a wire   09.09   27 connecting it?   09.09   28   MR. CURTIS: Objection, form.   09.09   29   20   Yeah. I guess I'm asking a slightly   09.09   20   20   4   4   2   4   4   2   4   4   4   4	2 A. Well, location information is an 09:06	2 tower could have a fiber-optic connection to the 09:11
5 Statement, it's information on a locational area, or 09:07 6 indoor system ID information, or both. 09:07 7 Q. In the patent, the location register would 09:07 8 only store indoor location information or outdoor 09:07 8 only store indoor location information or outdoor 09:07 10 same time. Correct? 09:08 11 A. I don't believe the patent states that. 09:08 12 It docsn't the patent does not preclude storing 09:08 13 both. 09:08 14 Q. Okay. 09:08 15 Let me ask you the next question, which is 09:08 16 that when the when the indoor gateway let me 09:08 17 ask it this way. 09:08 19 the internet, that connection to going to be connected to 09:08 20 through that gateway is going to be connected to 09:08 21 the internet through a wire, correct, at some point? 09:09 22 MR. CURTIS: Objection, form. 09:09 23 such as a cable coax cable, for example, yeah. 09:09 24 connected to the internet, and there could be a wire 09:09 25 such as a cable coax cable, for example, yeah. 09:09 26 onnected to the internet, is there any instances in 09:09 27 connection if? 09:09 28 MR. CURTIS: Objection, form. 09:09 29 the scope. 09:09 30 MR. CURTIS: Objection, form. 09:09 31 different question. In the situation when the owner of which there is not going to be a wire olivable of which there is not going to be a wire ultimately 09:09 31 different question. In the situation when the owner of the which there is not going to be a wire ultimately 09:09 31 different question. In the situation when the owner of the which there is not going to be a wire ultimately 09:09 31 different question. In the situation when the owner of the which there is not going to be a wire ultimately 09:09 31 different question. In the situation when the owner of the which there is not going to be a wire ultimately 09:09 31 lacelaration to a wire ultimately 09:09 32 mR. CURTIS: Objection, form. 09:09 33 lacerasingly, that commercion to the internet is 09:10 34 MR. CURTIS: Objection, form. 09:09 35 connection to the internet, is there any instances in	3 agreed-upon construction. And referring to, if I 09:07	3 internet server service provider's core network, 09:11
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7		6 O. Are you aware of any service provider 09:11
8 only store indoor location information or outdoor   09:07   9 location information. It won't store both at the   09:07   9 location information. It won't store both at the   09:07   9 location information. It won't store both at the   09:08   10 same time. Correct?   09:08   11 location information. It won't store both at the   09:09   12 life doesn't — the patient does not preclude storing   09:08   13 both.   09:08   13 both.   09:08   14 location   09:08   15 location   09:08   15 location   09:09   15 location   09:09   16 location   09:09   16 location   09:09   16 location   09:09   17 location   09:09   18 location   09:09   19 location   09:09   19 location   09:09   19 location   09:09   10 location   09		
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11   A. I don't believe the patent states that.   09:08   12   12   14   doesn't — the patent does not preclude storing   09:08   12   20   20   20   13   both.   09:08   14   Q. Okay.   09:08   15   Let me ask you the next question, which is   09:08   15   Let me ask you the next question, which is   09:08   16   that when the — when the indoor gateway — let me   09:08   17   ask it this way.   09:08   18   For 802.11 networks that are connected to   09:08   18   For 802.11 networks that are connected to   09:08   19   the internet, that connection is going to be   09:08   19   the internet, that connection is going to be   09:08   10   through — that gateway is going to be connected to   09:08   10   through — that gateway is going to be connected to   09:08   10   through — that gateway is going to be connected to   09:08   10   through — that gateway is going to be connected to   09:08   10   through — that gateway is going to be connected to   09:08   10   through — that gateway is going to be connected to   09:08   10   through — that gateway is going to be connected to   09:08   10   through — that gateway is going to be connected to   09:09   12   12   12   13   through — that gateway is going to be connected to   09:09   12   13   through — that gateway is going to be connected to   09:09   12   13   through — that gateway is going to be a wire lemance ould be a wire   09:09   12   13   through — through a wire, correct, at some point?   09:09   14   15   through — through a wire, correct, at some point?   09:09   12   13   through — through a wire, correct, at some point   09:09   14   15   through — through a wire, correct, at some point   09:09   15   16   Let me ask you this question, which is   09:12   17   through — through a wire, correct, at some point   09:09   16   16   Let me ask you this question, which is   09:12   17   through —		, , , , , , , , , , , , , , , , , , , ,
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1 Q. You were not able to understand Claim 12. 09:16	1 Q. If I said to you you can use any type of 09:20
2 Correct? 09:16	2 wire connection you want, what would you understand 09:21
3 A. I never said that I didn't understand 09:16	3 that to mean? 09:21
4 Claim 12. 09:16	4 A. The term that I've used in my writing is 09:21
5 Q. Sir, as a factual matter, as a person of 09:16	5 "wire line" versus "wireless," so when I use the 09:21
6 ordinary skill in the art, you're not able to 09:16	6 term "wire line," I do use that to refer to any 09:21
7 understand what Claim 12 is claiming. Correct? 09:16	7 connection that is not wireless. So that would 09:21
8 A. I don't believe that is a correct 09:16	8 include copper, for instance, or a fiber-optic 09:21
9 statement. 09:16	9 connection. 09:21
10 (Deposition Exhibit Number 3 09:15	10 Q. Okay. 09:21
11 marked for identification.) 09:13	11 Let me ask you the next question, which 09:21
12 BY MR. SHEASBY: 09:17	12 is, is it possible to implement a server using 09:21
13 Q. Why don't you go ahead and look at Exhibit 09:17	13 software alone on a general purpose computer? 09:21
14 3. 09:17	14 A. Can you repeat the question, please? 09:21
15 A. Did you want me to read the article? 09:17	15 Q. Sure. One second. 09:21
16 Q. Yes. 09:18	16 (Pause.) 09:22
17 (Pause.) 09:18	17 I'm marking a new exhibit. I'll tell you 09:22
Just to give you a heads up, the question 09:18	18 let me know when you get it. Okay? It should be 09:24
19 I'm asking is that after reviewing the article, it's 09:18	19 there for you. 09:24
20 fair to say that folks consider coaxial cable, 09:18	20 A. The folder shows five exhibits. 09:24
21 fiber-optic cable, and traditional copper wire as 09:18	21 (Deposition Exhibit Number 5 09:23
22 all options for wired connections to the internet? 09:18	22 marked for identification.) 09:21
23 A. Well, according to this off author of 09:19	23 BY MR. SHEASBY: 09:24
24 the article, he lists dial-up, cable internet, DSL, 09:19	24 Q. Yeah. So it's Exhibit Number 5. You 09:24
25 and fiber-optic as different forms of wired internet 09:19	25 probably want to download it because it's let me 09:24
Page 30	Page 32
1 connections. 09:19	1 know when you have it. 09:25
1 connections. 09:19 2 Q. So it would be fair to say that there are 09:19	1 know when you have it. 09:25 2 A. I have it. 09:25
	_
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2 Q. So it would be fair to say that there are 09:19 3 folks in this industry who treat fiber-optic, 09:19	2 A. I have it. 09:25 3 Q. If you scroll down, it talks about using 09:25
2 Q. So it would be fair to say that there are 09:19 3 folks in this industry who treat fiber-optic, 09:19 4 copper, and coaxial cable all as wired internet 09:19	2 A. I have it. 09:25 3 Q. If you scroll down, it talks about using 09:25 4 Windows PC as a router? 09:26
2 Q. So it would be fair to say that there are 09:19 3 folks in this industry who treat fiber-optic, 09:19 4 copper, and coaxial cable all as wired internet 09:19 5 connections? 09:19	2 A. I have it. 09:25 3 Q. If you scroll down, it talks about using 09:25 4 Windows PC as a router? 09:26 5 A. Okay. I see that. 09:26
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		23 Q. They reference a router. Correct? 09:35
	24 location register as being a node that performs a 09:31	23 Q. They reference a router. Correct? 09:35 24 A. Claim 1 references a router, and I would 09:36

1 Q. So let's go to the patent. 09:42	1 (Pause.) 09:45
2 A. So just to clarify my last answer. Even 09:43	2 And, actually, column eight. It says 09:47
3 though I said I don't have an opinion on the number 09:43	3 column eight, lines three through six, it says 09:47
4 of location registers, I did say that the location 09:43	4 (reading): The location register may be a 09:47
5 register does need to be in a known networking 09:43	5 home agent or a foreign agent, and uses a 09:47
6 location and implemented as a discrete node. 09:43	6 mobile IPv4 or IPv6 address system in order 09:47
7 Q. Yeah. I mean, what's the answer? Do you 09:43	7 to store the location into this location 09:47
8 have an opinion or do you not have an opinion? Does 09:43	8 8 register. 09:47
9 it have to be one physical location? Yes or no? 09:43	9 Do you see that, sir? 09:47
10 A. The simplest implementation would be one 09:43	10 A. I do see that. 09:47
11 physical location, but, you know, it depends on 09:44	11 Q. That language means that the patent is 09:47
12 it depends on the network. 09:44	12 limited to the use of a home agent or foreign agent. 09:47
13 If an operator had a network in one 09:44	13 Correct? 09:47
14 country and another network in another country, they 09:44	14 A. The patent says that the location register 09:47
15 might want to have a separate location register in 09:44	15 may be a home agent or foreign agent, and I read 09:47
16 each country. But that is, you know, outside the 09:44	16 that as home agent or foreign agent being an 09:48
17 scope of my opinions as stated in my declaration. 09:44	17 optional implementation. 09:48
18 Q. In other words, you can know and be able 09:44	18 THE WITNESS: I think we lost 09:48
19 to access the location register without it being in 09:44	19 MR. CURTIS: Okay. Let's just sit 09:48
20 one physical location. Correct? The network can do 09:44	20 here with the record on and let the clock run. 09:48
21 that? 09:44	21 THE WITNESS: Okay. 09:48
22 A. I don't believe that's what I said. 09:44	22 (Pause.) 09:50
23 Q. I'm actually asking you a question. Does 09:44	23 MR. CURTIS: He's saying he lost 09:51
24 it it needs to be in one physical location for a 09:44	24 internet. I'm sorry. Let's take a break. I'm good 09:51
25 location register to be accessed across a network. 09:44	25 with that. We're comfortable. Let's take a break, 09:51
Page 42	Page 44
1 Fair? 09:44	1 Peter, Videographer, Court Reporter. 09:51
2 A. What I said was that it needs to be in a 09:44	THE VIDEOGRAPHER: We are off the 09:51
3 known networking location so that a query made to 09:44	
4 that networking location can obtain the information 09:45	4 (Recess: 9:52 to 10:35 a.m.) 09:51
5 that it needs for the patent to function. 09:45	5 THE VIDEOGRAPHER: We are on the 10:34
6 Q. And a known to be a known networking 09:45	6 record at 10:35.
7 location, it must be a single physical location. 09:45	7 BY MR. SHEASBY: 10:34
8 Correct? 09:45	8 Q. Sir, did you have any conversations with 10:34
9 A. It would depend on what you mean by 09:45	9 your counsel at the break? 10:34
10 "physical location." 09:45	10 A. I did not. 10:34
11 Q. I mean a single physical box. 09:45	11 Q. I want to look at you referenced RC 202 10:34
12 A. A single physical box would be the 09:45	12 [sic] in your declaration. Correct? RFC 2002? 10:34
13 simplest implementation. 09:45	13 A. RFC 2002. 10:34
14 Q. It's the only allowed implementation. 09:45	14 Q. Yes. 10:34
15 Correct? 09:45	Did you read that document in preparation 10:34
16 A. I'm not sure what you mean by "allowed." 09:45	16 for your expert opinion? 10:34
17 Q. By the claims. 09:46	
18 A. I don't have an opinion on whether the 09:46	17 A. I did read that document. 10:35
16 A. I don't have an opinion on whether the 07.40	17 A. I did read that document. 10:35 18 Q. I'm marking as an exhibit RFC 2 I'm 10:35
_	18 Q. I'm marking as an exhibit RFC 2 I'm 10:35
_	18 Q. I'm marking as an exhibit RFC 2 I'm 10:35
19 claims how the claims allow the physical 09:46	18 Q. I'm marking as an exhibit RFC 2 I'm 10:35 19 introducing this as an exhibit. Let me know when 10:35
19 claims how the claims allow the physical 09:46 20 implementation. 09:46	18 Q. I'm marking as an exhibit RFC 2 I'm 10:35 19 introducing this as an exhibit. Let me know when 10:35 20 you get it. 10:35
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19 claims how the claims allow the physical 09:46 20 implementation. 09:46 21 Q. Okay. 09:46 22 Let me ask you the next question, which is 09:46	18 Q. I'm marking as an exhibit RFC 2 I'm 10:35 19 introducing this as an exhibit. Let me know when 10:35 20 you get it. 10:35 21 (Pause.) 10:35 22 A. Is that Exhibit 6? 10:35
19 claims how the claims allow the physical 09:46 20 implementation. 09:46 21 Q. Okay. 09:46 22 Let me ask you the next question, which is 09:46 23 let's go to the discussion of foreign agent in 09:46	18       Q. I'm marking as an exhibit RFC 2 I'm       10:35         19 introducing this as an exhibit. Let me know when       10:35         20 you get it.       10:35         21       (Pause.)       10:35         22       A. Is that Exhibit 6?       10:35         23       Q. Yes.       10:35
19 claims how the claims allow the physical 09:46 20 implementation. 09:46 21 Q. Okay. 09:46 22 Let me ask you the next question, which is 09:46 23 let's go to the discussion of foreign agent in 09:46 24 the patent. And I believe it starts at column 09:46	18       Q. I'm marking as an exhibit RFC 2 I'm       10:35         19 introducing this as an exhibit. Let me know when       10:35         20 you get it.       10:35         21       (Pause.)       10:35         22       A. Is that Exhibit 6?       10:35         23       Q. Yes.       10:35         24       A. Okay. I have it.       10:36

1 marked for identification.) 10:33	1 protocols would communicate to a fixed node to 10:43
2 BY MR. SHEASBY: 10:36	2 update and register locations. 10:43
3 Q. Is there anything in RFC 2002 that 10:36	3 Q. Yeah. And I'm asking you where in the RFC 10:43
4 indicates that either the foreign agent or the home 10:36	4 2002 strike that. Where in the RFC 2002 does it 10:43
5 agent must exist in a single physical device or 10:36	5 state that the home agent and foreign agent 10:43
6 single physical location? 10:36	6 functions must be on a single physical location? 10:43
7 A. I'm a little confused. The Exhibit 6 I 10:36	7 A. I would need to reread the specification 10:43
8 downloaded was testimony from Thomas Blackburn. 10:36	8 to see what it says about physical locations. 10:43
9 Q. Why don't we refresh and look for Exhibit 10:37	9 Q. Go ahead. 10:43
10 7. No. All right. Let me try it again. Give me 10:37	MR. SHEASBY: And go on the record. 10:44
11 one second. 10:37	11 I'm just going to pop off to get a cup of coffee. 10:44
12 (Pause.) 10:38	12 I'll be right back. 10:44
Okay, now try it. It's Exhibit 8. Let me 10:38	13 A. Okay. This is a 158-page document, so I'm 10:44
14 know when you get it. 10:38	14 beginning to read now. 10:44
15 A. I have it. 10:38	15 (Pause.) 10:44
16 Q. Is there anything in RFC 2002 that 10:39	16 BY MR. SHEASBY: 10:46
17 requires the home agent or foreign agent to run on a 10:39	17 Q. Sir, just let me know when you're ready to 10:46
18 single physical location? 10:39	18 answer the question. 10:46
19 A. I would need to read the entire 10:39	19 A. Okay. I'm still reading. 10:47
20 specification, but consistent with my declaration, 10:39	20 Q. Sure. 10:47
21 the home agent/foreign agent need to be at known 10:39	21 (Pause.) 10:50
22 networking locations so that messages such as 10:39	22 A. In scanning through the specification, I 10:51
23 registration messages can reach them. 10:39	23 didn't see a discussion of physical implementation 10:51
24 Q. So I understand that it's your position 10:40	24 of the functions. 10:51
25 that no network located it's your position that a 10:40	25 Q. So having scanned through the 10:51
Page 46	Page 48
1 location register must be at a known network 10:40	1 specification, do you find any limitation placed on 10:51
2 location. Correct? 10:40	2 the physical implementation of the home agent and 10:51
3 A. My declaration states that the location 10:40	3 foreign agent? 10:51
4 register needs to be at a known networking location. 10:40	4 A. In my scan of the document I didn't see 10:51
5 Q. And a known networking location requires a 10:40	5 any discussion of the physical implementation of the 10:51
6 single physical discrete location. Correct? 10:40	6 home agent and foreign agent, although I did see on 10:51
7 A. I don't agree with that statement. 10:40	7 page 15, consistent with my declaration, that there 10:51
8 Q. Okay. 10:41	
	8 is a registration process. 10:51
9 Let me ask you this question: Is the 10:41	9 For example, the specification states when 10:51
9 Let me ask you this question: Is the 10:41 10 location of a mobile terminal on a network known in 10:41	9 For example, the specification states when 10:51 10 the mobile node is away from home it registers its 10:51
9 Let me ask you this question: Is the 10:41 10 location of a mobile terminal on a network known in 10:41 11 the normal operation? 10:41	9 For example, the specification states when 10:51 10 the mobile node is away from home it registers its 10:51 11 care of address with its home agent, which, 10:52
9 Let me ask you this question: Is the 10:41 10 location of a mobile terminal on a network known in 10:41 11 the normal operation? 10:41 12 MR. CURTIS: Objection, form. 10:41	9 For example, the specification states when 10:51 10 the mobile node is away from home it registers its 10:51 11 care of address with its home agent, which, 10:52 12 consistent with my declaration, means that messages 10:52
9 Let me ask you this question: Is the 10:41 10 location of a mobile terminal on a network known in 10:41 11 the normal operation? 10:41 12 MR. CURTIS: Objection, form. 10:41 13 A. In some circumstances a network will know 10:41	9 For example, the specification states when 10:51 10 the mobile node is away from home it registers its 10:51 11 care of address with its home agent, which, 10:52 12 consistent with my declaration, means that messages 10:52 13 from the mobile node need to be able to reach the 10:52
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1 location? 11:00	1 location stored in the location register 11:05
2 Q. Is it possible to have a distributed 11:00	2 includes the indoor system ID. 11:05
3 system in which the distributed foreign agent or 11:00	3 Q. The patent teaches that the indoor lit 11:05
4 home agent in which each location that it's 11:00	4 [sic] location information is limited to the indoor 11:05
5 distributed across is known? 11:00	5 system ID. Correct? 11:05
6 A. That's a complex question, and I would 11:00	6 A. The agreed-upon construction is that the 11:05
7 have to study it in detail to be able to offer an 11:00	7 indoor system ID information is the information 11:05
8 opinion. 11:00	8 uniquely identified in the indoor network. Is that 11:05
9 Q. In terms of your best opinion for the 11:00	9 what you're referring to? 11:05
10 Court today, is it possible to have a distributed 11:01	10 Q. No. I'm just saying this passage is 11:05
11 system in which the location registers are at known 11:01	11 teaching that the only indoor location that can 11:06
12 locations even though they are distributed in 11:01	12 exist is the indoor system ID. Correct? 11:06
13 different physical components? 11:01	13 A. The patent uses the indoor system ID as 11:06
14 A. That's a very complicated question, and 11:01	14 the location information associated with the indoor 11:06
15 there are a lot of different variables to consider, 11:01	15 location. 11:06
- Factor of the	16 Q. In this passage is it teaching that the 11:06 17 only indoor location information that can be stored 11:06
17 Q. Does the 728 patent exclude the location 11:01	
18 of distributed location registers? 11:01	18 is the indoor system ID? Or can there be also other 11:06
19 A. I don't recall the 728 patent discussing 11:01	19 indoor location information stored? 11:06
20 distributed implementations of the location 11:01	20 A. Lines 23 and 24 refers just to the indoor 11:06
21 register. 11:02	21 system ID. 11:06
MR. SHEASBY: Yeah. Move to strike as 11:02	22 Q. It says (reading): Indoor location 11:06
23 not responsive. 11:02	23 stored in the location register includes 11:06
24 BY MR. SHEASBY: 11:02	24 the indoor system ID. 11:07
25 Q. Did you identify any portions of the 728 11:02	25 Do you see that? 11:07
Page 54	Page 56
1 patent that clearly and unambiguously exclude the 11:02	1 A. Right. 11:07
2 use of distributed location registers? 11:02	2 Q. Does that mean that indoor location is 11:07
3 A. The patent repeatedly discusses "a 11:02	3 equivalent to the indoor system ID? Or does the 11:07
4 location register" and other instances it says "the 11:02	4 word "includes" means that there could be additional 11:07
5 location register." 11:03	5 information beyond the indoor system ID? 11:07
6 Q. And you believe that limits it to one 11:03	6 A. I'd need to look at other places in the 11:07
7 single physical location register? 11:03	7 patent, but those lines in isolation don't make that 11:07
8 A. I don't believe the patent discusses the 11:03	
•	8 question clear. 11:07
9 exact implementation of the location register. 11:03	8 question clear. 11:07 9 Q. Okay. Let's go to Claim 1. Actually, 11:07
9 exact implementation of the location register. 11:03 10 Q. Okay. 11:03	8 question clear. 11:07 9 Q. Okay. Let's go to Claim 1. Actually, 11:07 10 let's go to the Blackburn declaration. I changed my 11:08
9 exact implementation of the location register. 11:03 10 Q. Okay. 11:03 11 And by "implementation" you mean physical 11:03	8 question clear. 11:07 9 Q. Okay. Let's go to Claim 1. Actually, 11:07 10 let's go to the Blackburn declaration. I changed my 11:08 11 mind. 11:08
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1 Q. In the patent, the location register is a 11:49	1 Q. Right. 11:54
2 register that records the location of the data 11:50	2 And what is that commonly understood 11:54
3 communication terminal. Correct? 11:50	3 meaning? 11:54
4 A. It stores the location information of the 11:50	4 A. As I said, it's a commonly understood 11:54
5 data communications terminal. 11:50	5 meaning, and I give examples of that in my 11:54
6 Q. The patent makes clear that the mobile 11:50	6 declaration. 11:54
7 terminal can't hold any of its location information. 11:50	7 Q. So and what is that in the patent, 11:54
8 Correct? 11:50	8 what is that readily and commonly understood 11:54
9 A. I don't have an opinion on that. 11:50	9 meaning? 11:54
10 Q. Okay. 11:50	10 A. The meaning, as I said, is one that would 11:55
The what is registered indoor system ID 11:50	11 be commonly understood. 11:55
12 information in the patent well, let me ask it 11:51	12 Q. Yes. 11:55
13 this way. I'll make it easy. 11:51	And what is that commonly understood 11:55
Registered system indoor registered 11:51	14 meaning? That's what I'm asking you. 11:55
15 outdoor system ID information is indoor system 11:51	15 A. I don't think it's up to me to provide a 11:55
16 information for which the data communication 11:51	16 dictionary definition of a common word. 11:55
17 terminal has been granted access. Is that fair? 11:51	17 Q. Right. 11:55
18 A. I understand that to be the Kaifi proposed 11:52	But what is the common meaning of that 11:55
19 construction. 11:52	19 word, of "registered"?
20 Q. Yeah. I'm asking for your opinion. 11:52	20 A. Well, the common meaning is the meaning 11:55
21 A. My opinion, as stated in my declaration, 11:52	21 that people would take for the word as it appears in 11:55
22 is that for registered indoor system ID information 11:52	22 different circumstances such as those that I give in 11:55
23 no additional construction is needed beyond 11:52	23 my declaration. 11:55
24 construction of indoor system ID information. 11:52	24 Q. And when the word common word 11:55
25 Q. Right. I understand that. I'm asking 11:52 Page 70	25 "registered" appears in the limitation, registered 11:55 Page 72
1 what does the word "registered" mean? 11:52	1 indoor system ID information, what is the what is 11:55
2 A. As stated in my declaration, registered is 11:52	2 the meaning that people take from the word 11:56
3 a term that has or is ubiquitous, and then I give 11:52	3 "registered"? 11:56
4 examples of registering for classes, registering a 11:52	4 A. Well, I think it's a term that would be 11:56
5 car, registering to vote, and so forth. 11:53	5 readily understood by a jury. And as I said, it's 11:56
6 Q. Yeah, so I've read your declaration. I'm 11:53	6 not for me to give a definition of the term because 11:56
7 actually asking a different question. 11:53	7 it is a commonly understood term. 11:56
8 You believe that registered has a plain 11:53	8 Q. What's your understanding of the term 11:56
9 and ordinary meaning, is that correct, in the 11:53	9 "registered" in the context of the claims? 11:56
10 patent? 11:53	10 A. As I said, it has a common meaning. 11:56
11 A. I'm stating that the meaning of the word 11:53	11 Q. Yes. 11:56
12 "registered" would be readily understood and that 11:53	12 And what is that common meaning? That's 11:56
13 the patent uses it in a way that would be readily 11:53	13 what I'm asking. 11:56
14 understood. 11:53	14 A. As I said, it's a term that would be 11:56
15 Q. Right. 11:53	15 understood as the word is used ubiquitously in life, 11:56
And what is that readily understood 11:53	16 and I give the examples of registering for classes, 11:56
17 meaning? 11:53	17 registering a car, registering to vote, and so 11:56
18 A. The readily understood meaning is the 11:53	18 forth. 11:56
19 meaning by which people would understand that term. 11:53	19 Q. Is registering to vote the same thing as 11:56
20 Q. Right. And I'm asking what that is. 11:53	20 registering the indoor system ID information? 11:57
When it says "registered indoor system ID 11:53	21 A. The word itself has a consistent meaning, 11:57
22 information," what does a person of ordinary skill 11:54	22 but you describe two different contexts, so 11:57
23 in the art understand that to mean? 11:54	23 Q. And what's that consistent meaning of 11:57
24 A. The meaning is the one that would be 11:54	24 registered? 11:57
25 commonly understood. 11:54	25 A. Well, as I said, it's the term that a jury 11:57
Page 71	Page 73

1 would understand and that people would understand. 11:5	1 MR. CURTIS: Objection, form. Asked 12:00
2 Q. And what do you understand if I said to 11:57	2 and answered. 12:00
3 you as a person who has been in this industry for 11:57	3 A. As I've already stated, the way I would 12:00
4 20-plus years, what does it mean to have a 11:57	4 understand the word "registered" is through the 12:00
5 registered indoor system ID information, what would 11:5'	5 common understanding of what the word "registered" 12:00
6 you say? 11:57	6 means. 12:00
7 A. Well, I would use the common understanding 11:57	7 BY MR. SHEASBY: 12:00
8 of the word "registered" and then apply it to the 11:57	8 Q. And what's that common understanding? 12:00
9 particular item that you just mentioned. 11:58	9 A. That common understanding is what people 12:00
10 Q. Okay. 11:58	10 in general would understand that word to mean. 12:00
What's the common understanding of 11:58	11 Q. And what is that common understanding? 12:00
12 "registered" in the item indoor system ID 11:58	12 MR. CURTIS: Objection, form. Asked 12:00
13 information? 11:58	13 and answered. We're going around in circles, Jason. 12:00
MR. CURTIS: Objection, form. 11:58	14 BY MR. SHEASBY: 12:01
15 A. As I said, the term is well understood, 11:58	15 Q. You can answer. 12:01
16 and it's not for me to provide a dictionary 11:58	16 A. That word is the one that would be readily 12:01
17 definition. 11:58	17 understood by people, including a jury. It's a 12:01
18 BY MR. SHEASBY: 11:58	18 common word.
19 Q. I'm not asking you to provide the 11:58	19 Q. Yeah. And I just I don't think it's a 12:01
20 dictionary definition. I'm asking how you 11:58	20 common word, and so I want to understand if your 12:01
21 understand it. 11:58	21 definition is the same as mine. 12:01
	22 A. As I said, I'm not here to provide a 12:01
23 term. 11:58	23 dictionary definition of the term. 12:01
24 Q. And what is that common usage? 11:58	24 Q. But do you even have an understanding of 12:01
25 A. Well, for instance, I give examples, and I 11:58 Page 74	25 the word what the word "registered" means? 12:01 Page 76
	9 11
1 give the examples of registering for classes, 11:58	1 A. My understanding would be consistent with 12:01
2 registering a car, registering to vote, and so 11:58	2 the common understanding of the word "registered." 12:01
3 forth. 11:58	3 Q. And what is that common understanding? 12:01
4 Q. Right. I understand that. 11:58	4 A. It's the understanding of the word in 12:01
5 I'm asking in the phrase "registered 11:58	5 situations such as registering for classes, 12:01
	8 8
6 indoor system ID information" what does registered 11:59	
6 indoor system ID information" what does registered 11:59 7 mean in that context? 11:59	
	6 registering a car, registering to vote, and so 12:01
7 mean in that context? 11:59	6 registering a car, registering to vote, and so 12:01 7 forth. 12:01
7 mean in that context? 11:59 8 A. It means that the indoor system ID 11:59	6 registering a car, registering to vote, and so 12:01 7 forth. 12:01 8 Q. Yes, and I understand. 12:01 9 What is that common understanding? 12:01
7 mean in that context? 11:59 8 A. It means that the indoor system ID 11:59 9 information is registered as per the common 11:59	6 registering a car, registering to vote, and so 12:01 7 forth. 12:01 8 Q. Yes, and I understand. 12:01 9 What is that common understanding? 12:01 10 A. That common understanding is the 12:02
7 mean in that context? 11:59 8 A. It means that the indoor system ID 11:59 9 information is registered as per the common 11:59 10 understanding of what the word "registered" means. 11:59	6 registering a car, registering to vote, and so 12:01 7 forth. 12:01 8 Q. Yes, and I understand. 12:01 9 What is that common understanding? 12:01 10 A. That common understanding is the 12:02
7 mean in that context? 11:59 8 A. It means that the indoor system ID 11:59 9 information is registered as per the common 11:59 10 understanding of what the word "registered" means. 11:59 11 Q. Right. 11:59	6 registering a car, registering to vote, and so 12:01 7 forth. 12:01 8 Q. Yes, and I understand. 12:01 9 What is that common understanding? 12:01 10 A. That common understanding is the 12:02 11 understanding that people would have from using or 12:02
7 mean in that context? 11:59 8 A. It means that the indoor system ID 11:59 9 information is registered as per the common 11:59 10 understanding of what the word "registered" means. 11:59 11 Q. Right. 11:59 12 And what is the common understanding of 11:59	6 registering a car, registering to vote, and so 12:01 7 forth. 12:01 8 Q. Yes, and I understand. 12:01 9 What is that common understanding? 12:01 10 A. That common understanding is the 12:02 11 understanding that people would have from using or 12:02 12 hearing the word "registered." 12:02
7 mean in that context? 11:59 8 A. It means that the indoor system ID 11:59 9 information is registered as per the common 11:59 10 understanding of what the word "registered" means. 11:59 11 Q. Right. 11:59 12 And what is the common understanding of 11:59 13 the word "registered"? 11:59	6 registering a car, registering to vote, and so 12:01 7 forth. 12:01 8 Q. Yes, and I understand. 12:01 9 What is that common understanding? 12:01 10 A. That common understanding is the 12:02 11 understanding that people would have from using or 12:02 12 hearing the word "registered." 12:02 13 Q. Okay. 12:02
7 mean in that context? 11:59 8 A. It means that the indoor system ID 11:59 9 information is registered as per the common 11:59 10 understanding of what the word "registered" means. 11:59 11 Q. Right. 11:59 12 And what is the common understanding of 11:59 13 the word "registered"? 11:59 14 A. That common meaning is the one that would 11:59	6 registering a car, registering to vote, and so 12:01 7 forth. 12:01 8 Q. Yes, and I understand. 12:01 9 What is that common understanding? 12:01 10 A. That common understanding is the 12:02 11 understanding that people would have from using or 12:02 12 hearing the word "registered." 12:02 13 Q. Okay. 12:02 14 You understand that I'm going to show the 12:02
7 mean in that context? 11:59 8 A. It means that the indoor system ID 11:59 9 information is registered as per the common 11:59 10 understanding of what the word "registered" means. 11:59 11 Q. Right. 11:59 12 And what is the common understanding of 11:59 13 the word "registered"? 11:59 14 A. That common meaning is the one that would 11:59 15 be understood by people, including a jury. 11:59	6 registering a car, registering to vote, and so 12:01 7 forth. 12:01 8 Q. Yes, and I understand. 12:01 9 What is that common understanding? 12:01 10 A. That common understanding is the 12:02 11 understanding that people would have from using or 12:02 12 hearing the word "registered." 12:02 13 Q. Okay. 12:02 14 You understand that I'm going to show the 12:02 15 testimony you just gave to Judge Gilstrap in this 12:02
7 mean in that context? 11:59 8 A. It means that the indoor system ID 11:59 9 information is registered as per the common 11:59 10 understanding of what the word "registered" means. 11:59 11 Q. Right. 11:59 12 And what is the common understanding of 11:59 13 the word "registered"? 11:59 14 A. That common meaning is the one that would 11:59 15 be understood by people, including a jury. 11:59 16 Q. So if I was to say, sir, I want you to 11:59	6 registering a car, registering to vote, and so 12:01 7 forth. 12:01 8 Q. Yes, and I understand. 12:01 9 What is that common understanding? 12:01 10 A. That common understanding is the 12:02 11 understanding that people would have from using or 12:02 12 hearing the word "registered." 12:02 13 Q. Okay. 12:02 14 You understand that I'm going to show the 12:02 15 testimony you just gave to Judge Gilstrap in this 12:02 16 case. Right? Are you sure this is what you want to 12:02
7 mean in that context?  8 A. It means that the indoor system ID  9 information is registered as per the common  11:59  10 understanding of what the word "registered" means.  11:59  12 And what is the common understanding of  11:59  13 the word "registered"?  11:59  14 A. That common meaning is the one that would  11:59  15 be understood by people, including a jury.  11:59  16 Q. So if I was to say, sir, I want you to  11:59  17 tell the jury what it means to be registered in the  11:59	6 registering a car, registering to vote, and so 12:01 7 forth. 12:01 8 Q. Yes, and I understand. 12:01 9 What is that common understanding? 12:01 10 A. That common understanding is the 12:02 11 understanding that people would have from using or 12:02 12 hearing the word "registered." 12:02 13 Q. Okay. 12:02 14 You understand that I'm going to show the 12:02 15 testimony you just gave to Judge Gilstrap in this 12:02 16 case. Right? Are you sure this is what you want to 12:02 17 do, this is the impression you want to leave him 12:02
7 mean in that context?  8 A. It means that the indoor system ID  9 information is registered as per the common  11:59  10 understanding of what the word "registered" means.  11:59  12 And what is the common understanding of  13:59  14 A. That common meaning is the one that would  13:59  15 be understood by people, including a jury.  16 Q. So if I was to say, sir, I want you to  17:59  18 phrase "registered indoor system ID information,"  11:59  19 what would you tell the jury?  11:59	6 registering a car, registering to vote, and so 12:01 7 forth. 12:01 8 Q. Yes, and I understand. 12:01 9 What is that common understanding? 12:01 10 A. That common understanding is the 12:02 11 understanding that people would have from using or 12:02 12 hearing the word "registered." 12:02 13 Q. Okay. 12:02 14 You understand that I'm going to show the 12:02 15 testimony you just gave to Judge Gilstrap in this 12:02 16 case. Right? Are you sure this is what you want to 12:02 17 do, this is the impression you want to leave him 12:02 18 with, sir? 12:02
7 mean in that context?  8 A. It means that the indoor system ID  9 information is registered as per the common  11:59  10 understanding of what the word "registered" means.  11:59  12 And what is the common understanding of  11:59  13 the word "registered"?  11:59  14 A. That common meaning is the one that would  11:59  15 be understood by people, including a jury.  16 Q. So if I was to say, sir, I want you to  11:59  17 tell the jury what it means to be registered in the  11:59  18 phrase "registered indoor system ID information,"  11:59  19 what would you tell the jury?  11:59  20 A. I would say take the term "system"  11:59	6 registering a car, registering to vote, and so 12:01 7 forth. 12:01 8 Q. Yes, and I understand. 12:01 9 What is that common understanding? 12:01 10 A. That common understanding is the 12:02 11 understanding that people would have from using or 12:02 12 hearing the word "registered." 12:02 13 Q. Okay. 12:02 14 You understand that I'm going to show the 12:02 15 testimony you just gave to Judge Gilstrap in this 12:02 16 case. Right? Are you sure this is what you want to 12:02 17 do, this is the impression you want to leave him 12:02 18 with, sir? 12:02 19 A. I'm just trying to answer your questions 12:02 20 the best I can. 12:02
7 mean in that context?  8 A. It means that the indoor system ID  9 information is registered as per the common  11:59  10 understanding of what the word "registered" means.  11:59  12 And what is the common understanding of  11:59  13 the word "registered"?  11:59  14 A. That common meaning is the one that would  11:59  15 be understood by people, including a jury.  11:59  16 Q. So if I was to say, sir, I want you to  11:59  17 tell the jury what it means to be registered in the  11:59  18 phrase "registered indoor system ID information,"  11:59  19 what would you tell the jury?  11:59  20 A. I would say take the term "system"  11:59  21 "indoor system ID information" and then apply your  11:59	6 registering a car, registering to vote, and so 12:01 7 forth. 12:01 8 Q. Yes, and I understand. 12:01 9 What is that common understanding? 12:01 10 A. That common understanding is the 12:02 11 understanding that people would have from using or 12:02 12 hearing the word "registered." 12:02 13 Q. Okay. 12:02 14 You understand that I'm going to show the 12:02 15 testimony you just gave to Judge Gilstrap in this 12:02 16 case. Right? Are you sure this is what you want to 12:02 17 do, this is the impression you want to leave him 12:02 18 with, sir? 12:02 19 A. I'm just trying to answer your questions 12:02 20 the best I can. 12:02 21 Q. Okay. 12:02
7 mean in that context? 11:59 8 A. It means that the indoor system ID 11:59 9 information is registered as per the common 11:59 10 understanding of what the word "registered" means. 11:59 11 Q. Right. 11:59 12 And what is the common understanding of 11:59 13 the word "registered"? 11:59 14 A. That common meaning is the one that would 11:59 15 be understood by people, including a jury. 11:59 16 Q. So if I was to say, sir, I want you to 11:59 17 tell the jury what it means to be registered in the 11:59 18 phrase "registered indoor system ID information," 11:59 19 what would you tell the jury? 11:59 20 A. I would say take the term "system" 11:59 21 "indoor system ID information" and then apply your 11:59 22 common personal understanding of the word 12:00	6 registering a car, registering to vote, and so 12:01 7 forth. 12:01 8 Q. Yes, and I understand. 12:01 9 What is that common understanding? 12:01 10 A. That common understanding is the 12:02 11 understanding that people would have from using or 12:02 12 hearing the word "registered." 12:02 13 Q. Okay. 12:02 14 You understand that I'm going to show the 12:02 15 testimony you just gave to Judge Gilstrap in this 12:02 16 case. Right? Are you sure this is what you want to 12:02 17 do, this is the impression you want to leave him 12:02 18 with, sir? 12:02 19 A. I'm just trying to answer your questions 12:02 20 the best I can. 12:02 21 Q. Okay. 12:02 22 I'm going to give you one opportunity 12:02
7 mean in that context?  8 A. It means that the indoor system ID  9 information is registered as per the common  11:59  10 understanding of what the word "registered" means.  11:59  11 Q. Right.  11:59  12 And what is the common understanding of  11:59  13 the word "registered"?  11:59  14 A. That common meaning is the one that would  11:59  15 be understood by people, including a jury.  11:59  16 Q. So if I was to say, sir, I want you to  11:59  17 tell the jury what it means to be registered in the  11:59  18 phrase "registered indoor system ID information,"  11:59  19 what would you tell the jury?  11:59  20 A. I would say take the term "system"  21 "indoor system ID information" and then apply your  11:59  22 common personal understanding of the word  23 "registered."  12:00	6 registering a car, registering to vote, and so 12:01 7 forth. 12:01 8 Q. Yes, and I understand. 12:01 9 What is that common understanding? 12:01 10 A. That common understanding is the 12:02 11 understanding that people would have from using or 12:02 12 hearing the word "registered." 12:02 13 Q. Okay. 12:02 14 You understand that I'm going to show the 12:02 15 testimony you just gave to Judge Gilstrap in this 12:02 16 case. Right? Are you sure this is what you want to 12:02 17 do, this is the impression you want to leave him 12:02 18 with, sir? 12:02 19 A. I'm just trying to answer your questions 12:02 20 the best I can. 12:02 21 Q. Okay. 12:02 22 I'm going to give you one opportunity 12:02 23 final opportunity. Do you want to weigh in as a 12:02
7 mean in that context?  8 A. It means that the indoor system ID  9 information is registered as per the common  11:59  10 understanding of what the word "registered" means.  11:59  12 And what is the common understanding of  11:59  13 the word "registered"?  11:59  14 A. That common meaning is the one that would  11:59  15 be understood by people, including a jury.  11:59  16 Q. So if I was to say, sir, I want you to  11:59  17 tell the jury what it means to be registered in the  11:59  18 phrase "registered indoor system ID information,"  11:59  19 what would you tell the jury?  11:59  20 A. I would say take the term "system"  11:59  21 "indoor system ID information" and then apply your  11:59  22 common personal understanding of the word  23 "registered."  12:00  24 Q. And what's your common understanding of  12:00	6 registering a car, registering to vote, and so 12:01 7 forth. 12:01 8 Q. Yes, and I understand. 12:01 9 What is that common understanding? 12:01 10 A. That common understanding is the 12:02 11 understanding that people would have from using or 12:02 12 hearing the word "registered." 12:02 13 Q. Okay. 12:02 14 You understand that I'm going to show the 12:02 15 testimony you just gave to Judge Gilstrap in this 12:02 16 case. Right? Are you sure this is what you want to 12:02 17 do, this is the impression you want to leave him 12:02 18 with, sir? 12:02 19 A. I'm just trying to answer your questions 12:02 20 the best I can. 12:02 21 Q. Okay. 12:02 22 I'm going to give you one opportunity 12:02 23 final opportunity. Do you want to weigh in as a 12:02 24 person who purports to be an expert in this field as 12:02
7 mean in that context?  8 A. It means that the indoor system ID  9 information is registered as per the common  11:59  10 understanding of what the word "registered" means.  11:59  11 Q. Right.  11:59  12 And what is the common understanding of  11:59  13 the word "registered"?  11:59  14 A. That common meaning is the one that would  11:59  15 be understood by people, including a jury.  11:59  16 Q. So if I was to say, sir, I want you to  11:59  17 tell the jury what it means to be registered in the  11:59  18 phrase "registered indoor system ID information,"  11:59  19 what would you tell the jury?  11:59  20 A. I would say take the term "system"  21 "indoor system ID information" and then apply your  11:59  22 common personal understanding of the word  23 "registered."  12:00	6 registering a car, registering to vote, and so 12:01 7 forth. 12:01 8 Q. Yes, and I understand. 12:01 9 What is that common understanding? 12:01 10 A. That common understanding is the 12:02 11 understanding that people would have from using or 12:02 12 hearing the word "registered." 12:02 13 Q. Okay. 12:02 14 You understand that I'm going to show the 12:02 15 testimony you just gave to Judge Gilstrap in this 12:02 16 case. Right? Are you sure this is what you want to 12:02 17 do, this is the impression you want to leave him 12:02 18 with, sir? 12:02 19 A. I'm just trying to answer your questions 12:02 20 the best I can. 12:02 21 Q. Okay. 12:02 22 I'm going to give you one opportunity 12:02 23 final opportunity. Do you want to weigh in as a 12:02

1 in the patent that we're dealing with? 12:02	1 of registered? 12:08
2 A. My opinion is the same as my previous 12:02	2 A. As I said, it's the meaning that a common 12:08
3 answer, that it's a term that would be readily 12:03	3 person would take from hearing or using the word 12:08
4 understood by a jury. 12:03	4 "registered." 12:08
5 Q. And what is that readily understanding 12:03	5 Q. And what is that plain meaning? 12:08
6 understanding? 12:03	6 A. The plain meaning is the meaning that a 12:08
7 A. As I said, it's the meaning that a common 12:03	7 person such as a person on a jury would understand. 12:08
8 person would understand from that term when they use 12:03	8 Q. And what is that plain and ordinary 12:09
9 or heard the term. 12:03	9 meaning? 12:09
10 Q. Right. 12:03	10 A. The plain and I ordinary meaning is what a 12:09
And I understand registered to mean, in 12:03	11 person would understand from the fact that the word 12:09
12 this context, that it the data communication 12:03	12 "registration" is ubiquitous in life such as 12:09
13 terminal has been granted access to the system that 12:03	13 registering for classes, registering a car, 12:09
14 is sending the indoor system ID information. Is 12:03	14 registering to vote, and so forth. 12:09
15 that the common understanding of the phrase? 12:03	15 Q. And what's that meaning? 12:09
16 A. Well, what you recited was a bit like the 12:03	16 A. The meaning is one that a person would 12:09
17 Kaifi proposed construction, which I disagree with. 12:04	17 readily understand. 12:09
18 Q. Right. 12:04	18 Q. And you can't tell me what that plain 12:09
19 And why do you disagree with it? 12:04	19 what that meaning is? 12:09
20 A. I disagree with it because the word 12:04	20 A. That meaning is the same one that a common 12:09
21 "registered" is a term that would be readily 12:04	21 person would understand. 12:09
22 understood by a jury. 12:04	22 Q. And what is that meaning? 12:10
23 Q. And it's not the meaning that Kaifi is 12:04	23 MR. CURTIS: Objection, form. Asked 12:10
24 proposing to give to it. Correct? 12:04	24 and answered. The witness is not a dictionary. 12:10
25 (Pause.) 12:05	25 A. As I've stated, the meaning is the same 12:10
Page 7	Page 80
1 A. Well, I state in my declaration that the 12:05	1 one that people would take from the common usage of 12:10
2 Kaifi construction replaces the simple and readily 12:05	2 the term such as in the examples I provide in my 12:10
3 understood term "registered" for, or with, for which 12:05	3 declaration. 12:10
4 the data communication terminal has been granted 12:0	5 4 BY MR. SHEASBY: 12:10
5 access. 12:05	5 Q. Okay. 12:10
6 Q. I understand that. 12:05	6 Let's go to column nine. Column nine is 12:10
7 So you disagree with Kaifi's construction, 12:05	7 discussing an embodiment in which the location 12:10
8 and tell me why you disagree with Kaifi's 12:05	8 register is the home agent or the foreign agent. 12:10
9 construction. What is it about it that doesn't 12:06	9 Correct? 12:11
10 reflect the common meaning? 12:06	10 A. I see home agent and foreign agent in 12:11
11 A. Well, my opinion is that the Kaifi 12:06	11 column eight but I don't see it so far in column 12:11
12 construction is not necessary because the word 12:07	12 nine. 12:11
13 "registered" is readily understood. 12:07	13 Q. Why don't you look at column nine, lines 12:11
14 Q. Right. 12:07	14 11 through 15? 12:11
So you disagree with the construction that 12:07	15 A. I see. Okay. 12:11
16 it's given by Kaifi? Or you think it's unnecessary? 12:07	16 Q. In that embodiment, the location 12:11
17 Is the Kaifi construction factually incorrect in 12:07	17 information is the locational area associated 12:12
18 your opinion? 12:07	18 with the located outdoors or with the indoor 12:12
19 A. I'm not sure what it means for a 12:07	19 system ID when the terminal is located indoors. 12:12
20 construction to be factually incorrect, but I 12:07	20 Correct? 12:12
21 disagree with their proposed construction because 12:07	21 A. Line 17 it says location information is 12:12
	21 A. Line 17 it says location information is 12:12 22 locational area outdoors, indoor system ID 12:12
21 disagree with their proposed construction because 12:07	22 locational area outdoors, indoor system ID 12:12
<ul> <li>21 disagree with their proposed construction because</li> <li>12:07</li> <li>22 the word "registered" has a plain and ordinary</li> <li>12:07</li> </ul>	22 locational area outdoors, indoor system ID 12:12
21 disagree with their proposed construction because 12:07 22 the word "registered" has a plain and ordinary 12:07 23 meaning, and "indoor system ID information" has 12:0	22 locational area outdoors, indoor system ID 12:12 7 23 information indoors, yes. 12:12

1 discusses home agents and foreign agents, but I 12:20	1 MR. CURTIS: Objection. Form. 12:26
2 don't believe the specification itself refers to 12:20	2 Outside the scope. 12:26
3 location registers. 12:20	3 A. Well, in the context of the 728 patent, 12:26
4 Q. Do you have an understanding 12:20	4 there's an agreed-upon construction for location 12:26
5 A. At least I don't recall that being the 12:20	5 information, and that's information of a locational 12:26
6 case. 12:20	6 area or indoor system ID information, or both. So 12:26
7 Q. Do you have an understanding of what the 12:20	7 if you're using the agreed-upon construction of 12:26
8 word "location register" means? 12:20	8 locational area or indoor system ID information, I 12:26
9 A. I understand what location register means 12:20	9 don't see the foreign agent, if it were to be based 12:26
10 in the context of the 728 patent, and I also 12:20	10 on RFC 2002, storing that specific information. 12:26
11 understand what location register would have meant 12:21	
12 to a person of ordinary skill in the art at the time 12:21	12 Q. Does the home agent store that specific 12:27
	13 information? 12:27
1	
14 Q. What does it mean in the context of the 12:21	14 A. The home agent, as implemented by RFC 12:27
15 728 patent? 12:21	15 2002, would not store the location information as 12:27
16 A. In the context of the 728 patent, it 12:21	16 per the agreed-upon construction, based on my 12:27
17 refers to a device that stores location information. 12:21	17 understanding of RFC 2002. 12:27
18 Q. Does the foreign agent store location 12:21	MR. SHEASBY: Okay. Why don't we 12:27
19 information in RFC 2002? 12:21	19 break for lunch. 12:27
20 A. I would need to refer to the 12:21	THE VIDEOGRAPHER: We are off the 12:27
21 specification. 12:21	21 record at 12:29. 12:27
22 Q. Go ahead. It's been marked as an exhibit. 12:21	22 (Recess: 12:29 to 1:19 p.m.) 12:27
23 Take as much time as you need. 12:22	THE VIDEOGRAPHER: We are on the 01:17
24 (Pause.) 12:22	24 record at 1:19. 01:17
25 A. RFC 2002 on page 17 says that the mobile 12:23	25 BY MR. SHEASBY: 01:17
Page 86	Page 88
1 node receives what's a "care of" address. So the 12:23	1 Q. Did you talk to your counsel at the break, 01:17
2 foreign agent would be aware of the mobile node 12:23	2 sir? 01:17
3 because when it receives tunnelled datagrams, it 12:24	3 A. I did not. 01:17
4 decapsulates datagrams and delivers the datagrams to 12:24 5 the mobile node. 12:24	4 Q. In a cellular system, what node generates 01:17 5 the location information? 01:18
5 the mobile node. 12:24	
( O C I DEC 12.24	
6 Q. So now you can answer my question. In RFC 12:24	6 MR. CURTIS: Objection, form. 01:18
7 2002 does the foreign agent store location 12:24	6 MR. CURTIS: Objection, form. 01:18 7 A. The location information depends on what 01:18
7 2002 does the foreign agent store location 12:24 8 information? 12:24	6 MR. CURTIS: Objection, form. 01:18 7 A. The location information depends on what 01:18 8 specific cellular technology is being used and the 01:18
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1 cases it can refer to a group of base stations. 01:20	1 to look at the specifications for each of them to 01:24
2 So those are some that come to mind at 01:20	2 see exactly what kind of information they may have 01:25
3 this time. 01:20	3 broadcast. 01:25
4 Q. For indoor WLAN networks, is there any 01:20	4 BY MR. SHEASBY: 01:25
5 information stored about that network other than 01:20	5 Q. Did you investigate whether WLAN networks 01:2
6 does that network pass on information other than its 01:20	6 at the time of the patent broadcast information 01:25
7 system ID information? 01:20	7 about their location beyond system ID? 01:25
8 MR. CURTIS: Objection. Form. 01:20	8 A. In developing my declaration I did not 01:25
9 Outside the scope. 01:20	9 consider that question. 01:25
10 A. The information that is communicated in a 01:20	10 Q. How does the system ID information provide 01:25
11 Wi-Fi network, for instance, could include an SSID. 01:20	11 location information? 01:25
12 I'm not sure if that's what we're referring to. 01:21	MR. CURTIS: Objection, form. 01:25
13 BY MR. SHEASBY: 01:21	13 A. In the context of the patent, the indoor 01:25
14 Q. And SSID is a system ID? 01:21	14 system ID information would provide location 01:26
15 A. It's a name for the network. I believe it 01:21	15 information to the extent that if you knew the 01:26
16 stands for subscriber set identifier, but it's a 01:21	16 locations where that indoor system ID information 01:26
17 name a user or network manager can enter into the 01:21	17 was being broadcast, then you could identify the 01:26
18 access point so the access point broadcasts that 01:21	18 location of the device to the coverage area of where 01:26
19 particular name of the network. 01:21	19 that indoor system ID information was being 01:26
Q. Is that different from an indoor system 01:21	20 provided. 01:26
21 ID? 01:21	21 BY MR. SHEASBY: 01:26
22 A. The indoor system ID information is one of 01:22	22 Q. Does location information in the patent 01:26
23 the agreed-upon construction's information uniquely 01:22	23 require that it be geographic information? 01:26
24 identifying the indoor network. The patent, I don't 01:22	24 A. I'd have to review the patent to be sure, 01:26
25 believe, mentions SSID. 01:22	25 but I don't recall a discussion of geographic 01:26
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1 Q. Right. 01:22	1 information with respect to parameters such as 01:27
1 Q. Right. 01:22 2 Does SSID provide location information on 01:22	1 1
	2 latitude or longitude. 01:27
2 Does SSID provide location information on 01:22 3 where a device is located? 01:22	2 latitude or longitude. 01:27 3 Q. Well, why don't you go ahead and read the 01:27
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1 entities. 01:40	1 Q. Let me ask you this question. Let me do 01:45
2 Q. So the indoor network and the outdoor 01:40	2 it this way. Is the can a router know the 01:45
3 network need to be separate from the mobile the 01:40	3 location of a terminal a mobile terminal? 01:45
4 mobile terminal. Correct? 01:40	4 Or maybe let me ask it this way. Does the 01:45
5 A. The mobile terminal is a different item 01:40	5 router have the ability to access information on a 01:45
6 from either the indoor network or the outdoor 01:40	6 mobile terminal? 01:45
7 network. 01:40	7 A. Well, per Claim 1, the router determines 01:45
8 Q. Right. 01:40	8 the location of the data communication location 01:46
9 And does the location register have to 01:40	9 stored in the terminal register. 01:46
10 reside on the indoor network or the outdoor network? 01:40	
	11 asking more specifically. 01:46
	Does routers do routers have the 01:46
	13 ability to access data that's stored at a mobile 01:46
	14 terminal? 01:46
15 Q. Any other requirement? 01:41	15 A. Do the routers in this patent or do the 01:46
	16 routers generically? 01:46
17 the mobile terminal can provide us information 01:42	17 Q. Generically, at the time of the patent, 01:46
	18 did routers have the ability to access information 01:46
	19 stored at a terminal? 01:46
	20 A. I don't have an opinion on that. 01:46
21 that question and do some additional analysis to 01:42	Q. At the time of the patent, did one mobile 01:47
	22 terminal have the ability to pass information to 01:47
	23 another mobile terminal? 01:47
	A. At the time of the patent, a mobile 01:47
25 today to do that. 01:43 Page 98	25 terminal could, for example, using an application, 01:47 Page 100
Tage 70	1 450 100
1 Q. There is. I can give you as much time as 01:43	1 store information that another terminal could 01:47
2 you want. We have a seven-hour deposition, so I'm 01:43	2 retrieve based on some application, so that 01:47
3 happy to give you all the time you want. Go ahead. 01:43	3 information could be passed from one mobile terminal 01:47
4 MR. CURTIS: Objection, form. Outside 01:43	4 to the other. 01:47
5 the scope. 01:43	5 MR. SHEASBY: Okay. I pass the 01:47
6 BY MR. SHEASBY: 01:43	6 witness. 01:47
7 Q. So you say that the location register has 01:43	7 MR. CURTIS: No questions for the 01:48
8 to be in a location such that the router can access 01:43	8 witness. 01:48
9 it and such that the terminal can provide location 01:43	9 MR. SHEASBY: Great. Thank you. 01:48
	10 THE WITNESS: Thank you. 01:48
	MR. CURTIS: Good seeing you, Jason. 01:48
	12 THE VIDEOGRAPHER: We are off the 01:48
_	13 record at 1:49. This concludes the deposition. 01:48
	14 (The deposition was concluded 01:48
	15 at 1:49 p.m.) 01:48
	16000 01:48
	17
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25 my declaration. 01:45	25 Page 101

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1 State of Oregon )
              ) ss.
 2 County of Lane )
 3
      I, Sara Fahey Wilson, CSR, a Certified Shorthand
 5 Reporter for the State of Oregon, certify that the
 6 witness was sworn and the transcript is a true
 7 record of the testimony given by the witness; that
 8 at said time and place I reported all testimony and
 9 other oral proceedings had in the foregoing matter;
10 that the foregoing transcript consisting of 101
11 pages contains a full, true and correct transcript
12 of said proceedings reported by me to the best of my
13 ability on said date.
      If any of the parties or the witness requested
15 review of the transcript at the time of the
16 proceedings, such correction pages are attached.
      IN WITNESS WHEREOF, I have set my hand this 13
18 day of April 2021, in the City of Eugene, County of
19 Lane, State of Oregon.
20
23 Sara Fahey Wilson, CSR
24 CSR No. 06-0400
25 Expiration Date: March 31st, 2023
                                                     Page 102
 1
                DECLARATION
 2
 3
       I hereby declare I am the deponent in the within
 4 matter; that I have read the foregoing transcript and
 5 know the contents thereof; and I declare that the same
 6 is true of my knowledge except as to the matters which
 7 are therein stated upon my information or belief, and as
 8 to those matters, I believe them to be true.
       I declare under the penalties of perjury
10 under the laws of the United States that the
11 foregoing is true and correct.
12
13
       This declaration is executed this day
14 of
                  _____, 20____, at
15
16
17
18
19
20
              PETER RYSAVY
21
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23
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25
                                                     Page 103
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